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[Final]

1.0 PRE-REMEDIAL

1. 8 Preliminary Assessment Documents

 Memo from Mark Rigatti, Weston-Sper, to Fred Stroud, EPA Region IV. (November 29, 1984) Concerning the Preliminary Site Assessment.

1.10 Expanded Site Inspection Documents

- 1. Memo from Scott Gardner, EPA Region IV, to Robert Rose, NUS Corporation. (August 02, 1988) Concerning Comments About the Site Investigation Report.
- 2. "Site Investigation Report Volume I Section 1-5," Revision 0, NUS Corporation. (August 16, 1988)
- 3. "Site Investigation Report Volume II Appendices," Revision 0, NUS Corporation. (August 16, 1988)

3.0 REMEDIAL INVESTIGATION (RI)

3. 2 Sampling and Analysis Data

- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (October 27, 1993) Transmittal of split sample data.
- Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (December 09, 1993)
 Transmittal of EPA-ESD Evaluation of QC and split sample data from Phase I Remedial Investigation.
- Letter from Craig Zeller, EPA Region 4, to Douglas Simmons, ENSR Consulting and Engineering. (January 06, 1994) Transmitting EPA-ESD raw split sample data from the Phase I Remedial Investigation.
- 4. Letter from Steve Truchon and Douglas Simmons, ENSR Consulting and Engineering, to Dale Theiling, South Carolina Department of Marine Resources. (February 04, 1994) Requesting a permit for conducting sampling in the Ashley River, Charleston, South Carolina.
- 5. Memo from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (May 12, 1994) Concerning selection of alternative species for body burden analysis for the Phase II Remedial Investigation field program.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Rhonda Fortson, EPA Region 4, Environmental Services Division. (July 19, 1994) Transmitting split sample analytical data for the Phase II Remedial Investigation field program.
- Letter from Craig Zeller, EPA Region 4, to Douglas Simmons, ENSR Consulting and Engineering.
 (August 15, 1994) Transmitting EPA-ESD Evaluation of QC and split data, Phase II Remedial Investigation field program.

3. 4 Work Plans and Progress Reports

- Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (March 09, 1993)
 Concerning EPA comments on the draft RI/FS Work Plan.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (April 06, 1993) Transmitting responses to EPA's comments on the draft RI/FS Work Plan on behalf of Beazer East, Inc.

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3.0 REMEDIAL INVESTIGATION (RI)

3. 4 Work Plans and Progress Reports

- 3. Letter from Douglas Simmons, ENSR Engineering and Consulting, to Craig Zeller, EPA Region 4. (April 09, 1993) Transmitting two memos, one presenting the conceptual model of the site hydrogeology and the associated proposed revisions to the Work Plan, the other concerning a request to extend the Phase I field program.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4.
 (April 13, 1993) Transmittal of response to EPA comments on the draft RI/FS Work Plan: Specification of Sampling Locations.
- 5. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (April 29, 1993) Transmitting the redline/strikeout version of the draft RI/FS Work Plan.
- 6. "Remedial Investigation/Feasibility Study Work Plan, V.1 Text," ENSR Consulting and Engineering. (May 1993)
- 7. "Remedial Investigation/Feasibility Study Work Plan, V.2 Appendices," ENSR Consulting and Engineering. (May 1993)
- Memo from John McConney, EPA Region 4, Environmental Services Division, to Craig Zeller, EPA Region 4. (May 05, 1993) Concerning review of the draft RI/FS Work Plan and the Laboratory QAPIP - Alta Analytical Laboratory, Inc.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Sandra Hursey, South Carolina Department of Health and Environmental Control. (May 12, 1993) Transmitting the draft text for the RI/FS Work Plan concerning the installation of containment booms.
- 10. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (June 01, 1993) Concerning approval of the May 1993 RI/FS Work Plan; attached are comments from the South Carolina Department of Health and Environmental Control dated 5/19/93 and 5/20/93.
- 11. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (August 02, 1993) Concerning notification of collection and analysis of two additional surface soil samples in the area of the Old Impoundment on the South Dredging Property.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region IV. (November 14, 1993) Concerning Phase II Addendum RI/FS Work Plan and Responsibility for Remediation.
- 13. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (November 17, 1993) Confirming the due date for the draft Treatability Study Work Plan.
- 14. Letter from Craig Zeller, EPA Region IV, to Shannon Craig, Beazer East, Inc. (November 19, 1993) Concerning Draft Phase II Addendum to RI/FS Work Plan and Responsibility for Remediation.
- 15. Memo from Waynon Johnson, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (December 07, 1993) Concerning comments on the draft Remedial Investigation/Feasibility Study Work Plan, Addendum, Phase II Field Program and the draft Technical Memorandum II for the RI/FS Oversight.
- 16. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (December 17, 1993) Concerning comments on the draft Treatability Study Work Plan.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4.
 (December 20, 1993) Transmittal of preliminary maps used to locate soil sampling locations for the Phase II Addendum for the RI/FS Work Plan.

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3.0 REMEDIAL INVESTIGATION (RI)

3. 4 Work Plans and Progress Reports

- 18. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (December 21, 1993) Concerning EPA comments on Appendix C of the RI/FS Work Plan for the Phase II Field Program; attached is a memo from Craig Zeller to the file explaining that the information in Appendix C is preliminary and should in no way be construed as final.
- 19. Memo from Billy Britton, South Carolina Department of Health and Environmental Control, to Richard Haynes, South Carolina Department of Health and Environmental Control. (December 29, 1993) Concerning comments on the draft Phase II RI/FS Work Plan.
- 20. "Remedial Investigation/Feasibility Study Work Plan Addendum Phase II Field Program," ENSR Consulting and Engineering. (January 1994)
- 21. Letter from Craig Zeller, EPA Region 4, to Douglas Simmons, ENSR Consulting and Engineering. (January 20, 1994) Transmitting EPA comments on the draft Treatability Study Work Plan; attached are comments dated 12/19/93 from Richard Haynes, South Carolina Department of Health and Environmental Control.
- 22. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (January 27, 1994) Concerning comments on the revised RI/FS Work Plan Addendum Phase II Field Program.
- 23. Letter from Craig Zeller, EPA Region IV, to Shannon Craig, Beazer East, Inc. (January 28, 1994) Concerning Approval of Phase II Addendum to RI/FS Work Plan.

3.8 Interim Deliverables

- "FINAL Technical Memorandum I Koppers Co., Inc. (Charleston Plant) Remedial Investigation/Feasibility Study Oversight," U.S. EPA Region IV. (April 06, 1993)
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (April 12, 1993) Transmitting the laboratory QAPP for Alpha Analytical Laboratory, Inc.
- Memo from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (April 12, 1993) Concerning proposed modifications to the SOPQAM for the draft RI/FS Work Plan.
- 4. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (April 26, 1993) Concerning responses to comments on laboratory Quality Assurance Program Plans.
- "Site Characterization Summary Former Koppers Site Charleston, South Carolina Volume 1 -Text," ENSR Consulting and Engineering. (September 1993)
- 6. "Site Characterization Summary Former Koppers Site Charleston, South Carolina Volume II Appendices," ENSR Consulting and Engineering. (September 1993)
- Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (September 28, 1993)
 Transmitting the Final Superfund Technical Assistance Response Team (START) Treatability
 Screening Report, dated 9/22/93.
- 8. "Treatability Study Technical Memorandum Former Koppers Site Charleston, South Carolina," ENSR Consulting and Engineering. (October 1993)
- 9. Letter from Craig Zeller, EPA Region IV, to Douglas Simmons, ENSR Consulting and Engineering. (November 09, 1993) Concerning Comments on Treatability Study Technical Memorandum.

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3.0 REMEDIAL INVESTIGATION (RI)

3.8 Interim Deliverables

- 10. Cross Reference: Memo from Waynon Johnson, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (December 07, 1993) Concerning comments on the draft Remedial Investigation/Feasibility Study Work Plan, Addendum, Phase II Field Program and the draft Technical Memorandum II for the RI/FS Oversight. [Filed and cited in Entry Number 15 of 3.4 REMEDIAL INVESTIGATION (RI) Work Plans and Progress Reports]
- 11. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (December 21, 1993) Transmitting comments on the draft Technical Memorandum II for RI/FS Oversight.
- 12. "Final Technical Memorandum II for the Koppers Company, Inc. (Charleston Plant) Remedial Investigation/Feasibility Study Oversight," U.S. EPA. (January 21, 1994)
- Letter From Deborah A. Vaughn-Wright, EPA Region IV, to Shannon Craig, Beazer East, Inc. (September 30, 1994) Concerning Data in the Site Characterization Summary.

3.10 Remedial Investigation (RI) Reports

- Letter from Mark Padilla, Powell, Goldstein, Frazer & Murphy, to Craig Zeller, EPA Region 4. (March 30, 1993) Concerning Beazer East's response to EPA, SCDHEC and NOAA comments to ENSR's RI/FS.
- Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (April 06, 1993)
 Concerning Beazer East's response to EPA, SCDHEC, and NOAA comments to ENSR's RI/FS.
- Letter from Susan Allen, ENSR Consulting and Engineering, to Jack Sullivan, City of Charleston Water Department. (April 13, 1993) Requesting information regarding public water use in the vicinity of the Former Koppers Wood Preserving Site in Charleston.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (May 26, 1994) Transmitting the Phase II Data Summary (which appears in the RI starting with Appendix G).
- Letter from Jane Settle, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region 4. (September 01, 1994) Concerning review of Section 6 of the [draft] Remedial Investigation Report.
- 6. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (September 06, 1994) Concerning revision of the calculation of Darcy's velocity in the shallow aguifer in the area of the former tank farm.
- 7. Memo from Waynon Johnson, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (September 07, 1994) Concerning comments on the draft Remedial Investigation Report.
- 8. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (September 09, 1994) Concerning comments on the draft Remedial Investigation Report.
- 9. A memo from Billy Britton, South Carolina Department of Health and Environmental Control, to Richard Haynes, South Carolina Department of Health and Environmental Control. (September 12, 1994) Concerning comments on the draft Remedial Investigation Report.
- Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (September 12, 1994)
 Concerning EPA/SCDHEC comments on the draft Remedial Investigation Report.

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3.0 REMEDIAL INVESTIGATION (RI)

3.10 Remedial Investigation (RI) Reports

- 11. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (December 12, 1994) Transmitting EPA and SCDHEC/Natural Resource Trustee comments (which are attached) on the revised Remedial Investigation report.
- 12. "Remedial Investigation Report, Former Koppers Site, Charleston, South Carolina, Volume I, Technical Report Sections 1 through 4," ENSR Consulting and Engineering. (January 1995)
- 13. "Remedial Investigation Report, Former Koppers Site, Charleston, South Carolina, Volume I, Technical Report Sections 5 through 8," ENSR Consulting and Engineering. (January 1995)
- "Remedial Investigation Report, Former Koppers Site, Charleston, South Carolina, Volume II Phase
 I, Appendices A through F," ENSR Consulting and Engineering. (January 1995)
- 15. "Remedial Investigation Report, Former Koppers Site, Charleston, South Carolina, Volume III Phase II, Appendices G through J," ENSR Consulting and Engineering. (January 1995)
- 16. "Remedial Investigation Report, Former Koppers Site, Charleston, South Carolina, Volume IV Phase II, Appendices K through R," ENSR Consulting and Engineering. (January 1995)
- 17. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (March 06, 1995)
 Concerning EPA's approval of the RI Report and the Technical Memorandum for Interim Remedial Measures; attached are comments from the South Carolina Department of Health and Environmental Control on the RI, as well as draft procedures for reclassification of state waters.

3.11 Health Assessments

- Letter from Razelle Hoffman and Susan Allen, ENSR Consulting and Engineering, to Lovyst Howell, South Carolina Department of Health and Environmental Control. (May 05, 1993) Transmitting comments on the Preliminary Public Health Assessment released by SCDHEC 3/24/93.
- 2. "Preliminary Health Assessment," Agency for Toxic Substances and Disease Registry (ATSDR). (July 22, 1993)

3.12 Endangerment Assessments

- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (May 19, 1994) Requesting an extension for submitting comments on EPA's draft Baseline Risk Assessment Report.
- 2. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (June 06, 1994) Transmitting comments on EPA's draft Baseline Risk Assessment Report.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (September 09, 1994) Concerning ENSR's recommended approach to the Ecological Risk Assessment.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (September 29, 1994) Comments on the draft Technical Memorandum 1, Baseline Ecological Risk Assessment.
- 5. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (October 05, 1994) Transmitting comments on the draft Interim Final Baseline Risk Assessment Report.

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3.0 REMEDIAL INVESTIGATION (RI)

3.12 Endangerment Assessments

- 6. Memo from Yanqing Mo and Gail Rawls Jeter, South Carolina Department of Health and Environmental Control, to Richard Haynes, South Carolina Department of Health and Environmental Control. (October 05, 1994) Concerning comments on the Interim Final Baseline Risk Assessment Report.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (November 14, 1994) Summarizing findings about the frequency and duration of exposure for current workers to various media at the Koppers Site.
- 8. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (November 17, 1994)
 Concerning comments on the Baseline Ecological Risk Assessment, Volume II, performed by Black & Veatch Waste Science, Inc.
- Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (December 02, 1994)
 Concerning additional information regarding the Baseline Ecological Risk Assessment, performed by Black & Veatch Waste Science, Inc.
- 10. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (January 05, 1995) Transmitting comments on the final Baseline Risk Assessment, prepared by Black & Veatch.
- 11. A letter from Krista Jones, Black & Veatch Waste Science, Inc., to Craig Zeller, EPA Region 4. (January 18, 1995) Transmitting the final Baseline Risk Assessment.
- Final Baseline Risk Assessment For Koppers Company, Inc. (Charleston Plant), Remedial Investigation/Feasibility Study Oversight, Black & Veatch Waste Science, Inc. (January 18, 1995)
- 13. Final Baseline Risk Assessment Volume II-Appendices for Koppers Company, Inc. (Charleston Plant), Remedial Investigation/Feasibility Study Oversight, Black and Veatch Waste Science, Inc. (January 18, 1995)
- 14. Final Baseline Risk Assessment Volume III-Appendices For Koppers Company, Inc. (Charleston Plant), Remedial Investigation/Feasibility Study Oversight, Black & Veatch Waste Science, Inc. (January 18, 1995)
- 15. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (January 19, 1995) Transmitting the final Human Health Baseline Risk Assessment, prepared by Black & Veatch.
- 16. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (February 20, 1995) Concerning comments on the Human Health Baseline Risk Assessment and the Interim Remedial Action fact sheet; included is a revised portion of the Uncertainty and Limitations Section of the Human Health BRA.
- 17. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (August 10, 1995) Concerning comments on recent information about the dermal absorption of pentachlorophenol.
- 18. A memo from Kevin Koporec, EPA Region 4, to Craig Zeller, EPA Region 4. (October 17, 1995) Concerning recommendations regarding health risks from elevated concentrations of lead in soil at the site.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4.
 (October 17, 1995) Transmitting the paper entitled: "Pentachlorophenol Dermal Absorption Issues," prepared by Brian Magee, Odgen.

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3.0 REMEDIAL INVESTIGATION (RI)

3.12 Endangerment Assessments

- 20. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (December 06, 1995) Concerning comments on the draft Addendum to the final Human Health Baseline Risk Assessment; the comments focus on the dermal absorption for pentachlorophenol and on the exposure frequency assumption used to derive the potential remedial goal for lead.
- 21. "Final Addendum to the Final Baseline Risk Assessment for Koppers Company, Inc. (Charleston Plant,) Remedial Investigation/Feasibility Study Oversight," Black & Veatch. (January 31, 1996)
- 22. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (February 13, 1996)
 Transmitting the final Addendum to the final Human Health Baseline Risk Assessment, prepared by Black & Veatch; the letter includes a response to the issues raised in Beazer's 12/6/95 letter.
- 23. Memo from Paul Anderson, Ogden, to Nancy Findley, US EPA-Environmental Response Team. (May 17, 1996) Concerning Beazer's proposed approach for completing the food chain analysis portion of the ecological risk assessment for the site.
- 24. Memo from Paul Anderson, Ogden, to Craig Zeller, EPA Region 4. (June 05, 1996) Concerning the Annotated Outline of the Ecological Risk Assessment and Proposed Presentation of Results for Avian Species.
- 25. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (June 13, 1996)
 Concerning the agreement that ERT (Emergency Response Team) would assume the lead role and responsibility for compiling the BERA (Baseline Ecological Risk Assessment).
- 26. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Nancy Findley, US EPA-Environmental Response Team. (July 09, 1996) Transmitting life history summaries for the species selected for inclusion in the Baseline Ecological Risk Assessment (BERA).
- 27. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region IV, Concerning Approval of the draft Final Report Ecological Risk Assessment, Prepared by ERT for the EPA. (July 29, 1996)
- 28. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region IV, Requesting an Extension of Time for Comments on the Ecological Risk Assessment, Prepared by ERT for the EPA. (August 01, 1996)
- 29. Letter from Roger Banks, US Department of the Interior, to Craig Zeller, EPA Region IV, Concerning Comments on Draft Ecological Risk Assessment, Prepared by ERT for the EPA. (August 02, 1996)
- 30. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region IV, Concerning Initial Comments on July 1996 Ecological Risk Assessment, Prepared by ERT for the EPA. (August 02, 1996)
- 31. Letter from Craig Zeller, EPA Region IV, to Shannon Craig, Beazer East, Inc., Concerning Approval of Extension of Time for Comments. (August 07, 1996)
- 32. Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region IV, Concerning Comments on Draft Ecological Risk Assessment, Prepared by ERT for the EPA. (August 12, 1996)
- 33. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region IV, Concerning Additional Comments on July 1996 Ecological Risk Assessment, Prepared by ERT for the EPA. (August 15, 1996)

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3.0 REMEDIAL INVESTIGATION (RI)

3.12 Endangerment Assessments

- 34. "Final Report Ecological Risk Assessment Koppers Woodtreating Charleston, South Carolina," Environmental Response Team (ERT). (October 1996)
- 35. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region IV, Concerning Comments on the Site-Specific Baseline Ecological Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 09, 1996)
- 36. Letter from Robert Duncan, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region IV, Concerning Comments on the Site-Specific Baseline Ecological Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 10, 1996)
- 37. Letter from Catherine Duncan, US Department of the Interior, to Craig Zeller, EPA Region IV, Concerning Comments on the Site-Specific Baseline Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 15, 1996)
- 38. A letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region IV, Concerning Comments on the Site-Specific Baseline Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 23, 1996)
- 39. Letter from Craig Zeller, EPA Region IV, to Shannon Craig, Beazer East, Inc., Concerning EPA Comments on the Site-Specific Baseline Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 23, 1996)
- 40. Cross-Reference: the SITE SPECIFIC BASELINE ECOLOGICAL RISK ASSESSMENT FORMER KOPPERS SITE CHARLESTON, SOUTH CAROLINA, PREPARED BY OGDEN ENVIRONMENTAL AND ENERGY SERVICES CO., INC. can be found in the FEASIBILITY STUDY REPORT, Appendix F, pages 4 9 1004 through 4 9 1191. (December 1996) [Filed and Cited as Entry Number 7 in 4.9 FEASIBILITY STUDY (FS) Feasibility Study (FS) Reports].
- 41. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (May 27, 1997)
 Responding to EPA 10/25/96 comments on Beazer's draft Site-Specific Baseline Ecological Risk
 Assessment (8/96).

4.0 FEASIBILITY STUDY (FS)

4. 2 Sampling and Analysis Data

- Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (April 28, 1995)
 Concerning request to ENSR to transmit a portion of the Phase III Investigation analytical data [NOTE: ENCLOSURES ARE NOT ATTACHED TO DOCUMENT].
- Facsimile transmitting analytical results. (May 18, 1995)
- 3. Facsimile transmitting Arsenic results. (May 19, 1995)
- 4. Facsimile transmitting organic analytical data. (May 19, 1995)
- 5. Facsimile from ENSR transmitting a sample summary as well as maps showing sampling locations. (May 19, 1995)
- 6. Facsimile transmittal from Douglas Simmons, ENSR Consulting and Engineering, to Addressees. (May 22, 1995) Transmitting tables of sampling results and figures of sampling locations.
- 7. Facsimile transmittal from Nancy Seabolt, ManTech Environmental Technology, Inc., to Craig Zeller, EPA Region 4. (May 22, 1995) Transmitting analytical data sheets.

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4.0 FEASIBILITY STUDY (FS)

4. 2 Sampling and Analysis Data

- 8. Facsimile transmittal from Nancy Seabolt, ManTech Environmental Technology, Inc., to Craig Zeller, EPA Region 4. (May 22, 1995) Transmitting inorganic analysis data sheets.
- 9. Memo from Tom Bennett, EPA Region 4, Environmental Services Division, to Bill Bokey, EPA Region 4. (June 14, 1995) Transmitting analytical results from the FASP laboratory.
- 10. Memo from Tom Bennett, EPA Region 4, Environmental Services Division, to Bill Bokey, EPA Region 4. (July 15, 1995) Transmitting analytical results from the FASP laboratory.
- 11. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (August 10, 1995) Concerning sampling locations for chemistry and whole-sediment toxicity sampling.
- 12. "Sampling Report Kopper's NPL Site Charleston, Charleston County, South Carolina ESD Project No. 96-0177," (discussing methodology and results of soil sampling along the uplands leading out to the Ashley River). (April 1996)
- 13. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (May 29, 1996) Transmitting the ESD Sampling Report.
- 14. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (June 11, 1996) Transmitting analytical results of deep monitoring well sampling.
- 15. Memo from Craig Zeller, EPA Region 4, to John Nocerino, U.S. EPA EMSL Las Vegas. (June 11, 1996) Requesting statistical analysis of (TCLP) lead sampling data from uplands leading to the Ashley River.
- 16. Facsimile transmittal from John Nocerino, U.S. EPA-EMSL Las Vegas, to Craig Zeller, EPA Region 4. (June 24, 1996) Transmitting statistical analysis of (TCLP) lead samples sent to him by Craig Zeller 6/11/96.
- 17. Letter from James Allen, Conoco Inc., to Craig Zeller, EPA Region 4. (December 04, 1996)
 Transmitting statistical analysis of (TCLP) lead samples performed by ERM.
- 18. Facsimile transmittal from John Nocerino, U.S. EPA-EMSL Las Vegas, to Craig Zeller, EPA Region 4. (December 05, 1996) Transmitting corrections of the statistical analysis transmittal sent in June of the (TCLP) lead samples.

4. 4 Work Plans and Progress Reports

- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (February 27, 1996) Transmittal of the Work Plan for the Supplemental Phase III Ecological Field Program.
- Letter from Craig Zeller, EPA Region 4, to John Chidley, E.I. Du Pont De Nemours & Co. (September 30, 1996) Requesting a proposed work plan to address the on-going transport pathway into the South Tidal Marsh and the upland acidic pH condition.

4. 8 Interim Deliverables

- 1. "Phase III Investigation Report Former Koppers Site Charleston, South Carolina," ENSR. (September 1995)
- 2. Letter from John Lindsay, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (October 06, 1995) Concerning comments on the draft Technical Memorandum Phase III Ecological Sampling.

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4.0 FEASIBILITY STUDY (FS)

4. 8 Interim Deliverables

- 3. Letter from Jane Settle, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region 4. (October 10, 1995) Concerning comments on the draft Technical Memorandum Phase III Ecological Sampling.
- 4. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (October 17, 1995) Concerning EPA comments on the draft Technical Memorandum Phase III Ecological Sampling; included are a letter and a memo from South Carolina Department of Health and Environmental Control commenting on the draft Technical Memorandum Phase III Ecological Sampling and the draft Interim Action Remedial Design for Drainage and Groundwater Collection Facilities.
- Letter from Craig Zeller, EPA Region IV, to Shannon Craig, Beazer East, Inc., Concerning EPA Comments on Draft Phase III Field Investigation Report. (November 15, 1995)
- 6. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (November 17, 1995) Transmitting the final Technical Memorandum, Phase III Ecological Sampling.
- 7. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (January 31, 1996) Concerning responses to Conoco Inc.'s and Agrico Chemical Company's comments on the Phase III Field Program Report.
- 8. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (February 14, 1996) Concerning EPA comments on the Phase III Ecological Sampling Technical Memorandum.
- Cross Reference: Memo from Craig Zeller, EPA Region 4, to Addressees. (February 26, 1996)
 Concerning the agenda of the 2/28/96 meeting regarding negotiation of HEA input parameters and resolution of issues to finalize the Phase III Ecological report. [Filed and cited in Entry Number 3 of 4. 9 FEASIBILITY STUDY (FS) Feasibility Study (FS) Reports]
- Letter from Roger Banks, US Department of the Interior, to Craig Zeller, EPA Region 4. (May 06, 1996)
 Concerning comments on the following two documents: Technical Memorandum Phase III Ecological Sampling; and Summary of Ecological Studies and Assessment of Potential Risk.
- 11. Memo from Kevin Koporec, EPA Region 4, Craig Zeller, EPA Region 4. (May 22, 1996)
 Concerning comments on the Development of Remedial Goals for Soils, prepared by Ogden.
- 12. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region IV, Concerning Response to EPA and South Carolina Department of Health and Environmental Control Comments on Phase III Field Investigation Report. (August 02, 1996)
- Electronic Memo from Kevin Beswick, EPA Region IV, to Craig Zeller, EPA Region IV, Transmitting United States Army Corps of Engineers Permitting Requirements for the Beazer Remedy. (October 03, 1996)
- 14. "Technical Memorandum Phase III Ecological Sampling Former Koppers Site Charleston, South Carolina," ENSR Consulting and Engineering. (December 1996)

4. 9 Feasibility Study (FS) Reports

 Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (September 22, 1995) Concerning determination of MW-13S that it is representative of surface water and should be addressed in the FS as soil/sediments and surface water pathways.

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

4.0 FEASIBILITY STUDY (FS)

4. 9 Feasibility Study (FS) Reports

- 2. Letter from John Lindsay, National Oceanic and Atmospheric Administration, to Shannon Craig, Beazer East, Inc. (November 01, 1995) Concerning possible applications of Habitat Equivalency Analysis (HEA) within the FS time frame.
- 3. Memo from Craig Zeller, EPA Region 4, to Addressees. (February 26, 1996) Concerning the agenda of the 2/28/96 meeting regarding negotiation of HEA input parameters and resolution of issues to finalize the Phase III Ecological report.
- 4. Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Shannon Craig, Beazer East, Inc. (March 18, 1996) Concerning a technical agreement in principle that Beazer will create the equivalent of five acres of wetlands within or near the Koppers Site.
- 5. Memo from Craig Zeller, EPA Region 4, to Douglas Simmons, ENSR Consulting and Engineering, Shannon Craig, Beazer East, Inc., and Richard Haynes, South Carolina Department of Health and Environmental Control. (March 20, 1996) Concerning EPA comments on the draft Feasibility Study.
- 6. Routing and Transmittal slip from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (March 21, 1996) Transmitting comments on the Feasibility Study.
- 7. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (March 22, 1996) Concerning comments on the draft Feasibility Study; attached are FS comments from Billy Britton, South Carolina Department of Health and Environmental Control, to Richard Haynes, South Carolina Department of Health and Environmental Control.
- 8. Letter from Jane Settle, South Carolina Department of Natural Resources, Craig Zeller, EPA Region 4. (March 25, 1996) Concerning comments on the draft Feasibility Study.
- 9. Memo from Craig Zeller, EPA Region 4, to Denise Klimas, National Oceanic and Atmospheric Administration. (April 08, 1996) Concerning a request for specifications on the Low Intertidal SPARTINA Marsh Reconstruction/Creation.
- 10. Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (April 15, 1996) Concerning comments on the draft Feasibility Study Report.
- 11. Letter from Shannon Craig, Beazer East, Inc., to Denise Klimas, National Oceanic and Atmospheric Administration. (April 29, 1996) Concerning response to NOAA's 3/18/96 letter regarding the Technical Agreement in Principle for Beazer to create wetlands in or near the Koppers site.
- 12. Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (May 01, 1996) Concerning recommendations and guidelines regarding a marsh creation plan, that Craig Zeller requested in his 4/8/96 letter.
- 13. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (May 20, 1996) Requesting an additional remedial alternative be evaluated in the revised Feasibility Study.
- 14. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (May 29, 1996)
 Concerning suggested language on Technical Impracticability of Groundwater Restoration and
 Revisions to Applicable Sections of the draft Feasibility Study.

[Final]

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

4.0 FEASIBILITY STUDY (FS)

4. 9 Feasibility Study (FS) Reports

- 15. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (May 29, 1996) Concerning EPA comments on Section 1.7.1 and Appendix C (Development of Remedial Goals for Sediment and Soils) of the draft Feasibility Study.
- Memo from Craig Zeller, EPA Region 4, to Addressees. (June 27, 1996) Transmitting Sections 1-3 of the revised Feasibility Study report for review and requesting comments.
- Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region IV, Concerning Comments on the Revised Feasibility Study Report. (July 18, 1996)
- 18. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region IV, Concerning Comments on the Revised Feasibility Study Report; Also Transmitting Comments from Billy Britton, South Carolina Department of Health and Environmental Control. (July 30, 1996)
- 19. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region IV, Concerning Additional Comments on the Feasibility Study Report. (August 21, 1996)
- 20. Memo from Terry Lyons, National Risk Management Research Laboratory, to Craig Zeller, EPA Region 4. (September 05, 1996) Concerning comments on the Feasibility Study report.
- 21. Memo from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc., and Douglas Simmons, ENSR Consulting and Engineering. (October 17, 1996) Transmitting comments on Section 1 of the FS Report; also included are comments from South Carolina Department Health and Environmental Control.
- 22. Letter from Craig Zeller, EPA Region IV, to Shannon Craig, Beazer East, Inc., Concerning EPA/SCDHEC Comments on the Revised Feasibility Study Report. (November 06, 1996)
- 23. "Feasibility Study Report Former Koppers Site Charleston, South Carolina Volume I Technical Report," ENSR Consulting and Engineering. (December 1996)
- 24. "Feasibility Study Report Former Koppers Site Charleston, South Carolina Volume II Appendices A Through C," ENSR Consulting and Engineering. (December 1996)
- 25. "Feasibility Study Report Former Koppers Site Charleston, South Carolina Volume III Appendices D Through G," ENSR Consulting and Engineering. (December 1996)
- 26. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (January 13, 1997) Concerning South Carolina's nonconcurrence with the Feasibility Study.
- 27. Memo from Craig MacPhee, ENSR Consulting and Engineering, to Doug Simmons, ENSR Consulting and Engineering, Concerning Revised Cost Estimates to Include Spoils Pile and Area West of Spoils Pile. (March 14, 1997)
- 28. Memo from Craig Zeller, EPA Region IV, to Administrative Record and Kevin Koporec, EPA Region IV, Concerning EPA's Final Soil Lead Cleanup Goal. (March 25, 1997)

4.10 Proposed Plans for Selected Remedial Action

1. Facsimile transmittal from ENSR to Craig Zeller, EPA Region 4. (May 15, 1996) Transmitting pages from ENSR's Proposed Plan.

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

4.0 FEASIBILITY STUDY (FS)

4.10 Proposed Plans for Selected Remedial Action

- 2. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (January 07, 1997) Concerning comments on the Proposed Plan, and SCDHEC's nonconcurrence with EPA's proposed remedy.
- 3. Letter from R. Gary Stewart, South Carolina Department of Health and Environmental Control, to Jan Rogers, EPA Region 4. (February 27, 1997) Transmitting SCDHEC's clarification of the Department's views on issues relating to EPA's Proposed Plan briefing paper dated 1/13/97.
- Superfund Proposed Plan Fact Sheet Koppers Co., Inc. (Charleston Plant) NPL Site Charleston, Charleston County, South Carolina. (March 1997)
- Memo from Craig Zeller, EPA Region 4, to Larry Zaragoza, Mark Maddaloni, and Kevin Koporec, U.S. Environmental Protection Agency. (March 04, 1997) Requesting support of EPA-Region 4's selection lead soil cleanup goal under a future industrial "worker" exposure scenario, with attachments.
- Memo from Craig Zeller, EPA Region 4, to the Administrative Record and to Kevin Koporec, EPA Region 4. (March 25, 1997) Documenting EPA-Region 4's final soil lead cleanup goal for an adult non-residential exposure scenario, with attachments.
- Cross-Reference: the LETTER FROM BILLIE FLAHERTY, BEAZER EAST, INC., TO CRAIG ZELLER, EPA REGION 4, CONCERNING COMMENTS ON THE PROPOSED PLAN can be found in the RECORD OF DECISION, Appendix B, Attachment 2, pages 5 9 0484 through 5 9 0508.
 (May 30, 1997) [Filed and Cited as Entry Number 11 in 5.9 RECORD OF DECISION (ROD) Record of Decision (ROD)].
- 8. The Attachments A through J for the letter dated 5/30/97 from Billie Flaherty, Beazer East, Inc., to Craig Zeller, EPA Region 4, commenting on the Proposed Plan. (May 30, 1997)
- Cross-Reference: the LETTER FROM JAMES ALLEN, CONOCO, TO CRAIG ZELLER, EPA REGION 4, CONCERNING COMMENTS ON THE PROPOSED PLAN can be found in the RECORD OF DECISION, Appendix B, Attachment 2, pages 5 9 0512 through 5 9 0556. (June 02, 1997) [Filed and Cited as Entry Number 11 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].
- 10. The Conoco Responses to the March 1997 U.S. Environmental Protection Agency Superfund Proposed Plan Fact Sheet - Koppers Co., Inc. (Charleston Plant) NPL Site - Charleston, South Carolina - Appendices - Volume 2 - Appendix A through I, ERM-Southwest. (June 02, 1997)
- 11. The Conoco Responses to the March 1997 U.S. Environmental Protection Agency Superfund Proposed Plan Fact Sheet Koppers Co., Inc. (Charleston Plant) NPL Site Charleston, South Carolina Appendices Volume 3 Appendix J through L, ERM-Southwest. (June 02, 1997)
- 12. The Conoco Responses to the March 1997 U.S. Environmental Protection Agency Superfund Proposed Plan Fact Sheet Koppers Co., Inc. (Charleston Plant) NPL Site Charleston, South Carolina Appendices Volume 4 Appendix M through P, ERM-Southwest. (June 02, 1997)
- 13. Facsimile transmittal from Craig MacPhee, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (August 07, 1997) Transmitting cost estimates on alternative remediation approach.
- 14. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (October 15, 1997) Concerning Beazer's response to Natural Resource Trustee comment to the Proposed Remedial Action Plan.

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

5.0 RECORD OF DECISION (ROD)

5. 1 Correspondence

- Cross-Reference: the LETTER FROM R. LEWIS SHAW, SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL, TO JOHN HANKINSON, EPA REGION 4, CONCERNING SOUTH CAROLINA'S LACK OF CONCURRENCE WITH EPA'S SELECTED REMEDY, can be found in the RECORD OF DECISION, Appendix A, pages 5 9 0291 through 5 9 0292. (December 11, 1997) [Filed and Cited as Entry Number 11 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].
- 2. Cross-Reference: the LETTER FROM JOHN HANKINSON, EPA REGION 4, TO R. LEWIS SHAW, SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL, TRANSMITTING EPA'S TECHNICAL RESPONSE TO SOUTH CAROLINA'S LACK OF CONCURRENCE WITH EPA'S SELECTED REMEDY can be found in the RECORD OF DECISION, Appendix A, pages 5 9 0293 through 5 9 0300. (March 18, 1998) [Filed and Cited as Entry Number 11 in the RECORD OF DECISION (ROD) Record of Decision (ROD)].

5. 2 Responsiveness Summaries

- Cross-Reference: the RESPONSIVENESS SUMMARY can be found in the INTERIM ACTION RECORD OF DECISION, Appendix B, pages 5 9 0043 through 5 9 0049. (March 29, 1995) [Filed and Cited as Entry Number 1 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].
- 2. Cross-Reference: the RESPONSIVENESS SUMMARY can be found in the RECORD OF DECISION, Appendix B, pages 5 9 0302 through 5 9 0345. (April 29, 1998) [Filed and Cited as Entry Number 11 in 5.9 RECORD OF DECISION (ROD) Record of Decision (ROD)].

5. 9 Record of Decision (ROD)

- "Interim Action Record of Decision (ROD) for the Koppers Co., Inc. (Charleston Plant) NPL Site, Charleston, Charleston County, South Carolina, March 1995," EPA Region IV. (March 29, 1995)
- Letter from Robert Mikell, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (July 23, 1997) Requesting a Consistency Statement from EPA because of the impacts the project will have on the Critical Area and the Coastal Zone.
- Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (September 08, 1997) Concerning SCDHEC's comments on the Record of Decision (ROD); the letter also addresses SCDHEC's nonconcurrence of the selected remedy.
- 4. Letter from Robert Mikell, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (September 08, 1997) Requesting more information than is in the ROD regarding consistency with the South Carolina Coastal Management program; attached are letters dated 4/10/97 and 7/23/97.
- 5. Letter from Robert McAdory, U.S. Army Corps of Engineers, to Craig Zeller, EPA Region 4. (September 09, 1997) Concerning comments on the Record of Decision (ROD).
- 6. Letter from Robert Duncan, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region 4. (September 10, 1997) Concerning comments on the Record of Decision (ROD).
- 7. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (September 15, 1997) Concerning comments on the Record of Decision (ROD).
- 8. Letter from Tom Dillon, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (September 15, 1997) Concerning comments on the Record of Decision (ROD).

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

5.0 RECORD OF DECISION (ROD)

5. 9 Record of Decision (ROD)

- 9. Letter from Richard Haynes and Billy Britton, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (October 06, 1997) Concerning comments on the Record of Decision (ROD).
- 10. Letter from Richard Haynes, South Carolina Department of Health and Environmental Control, to Craig Zeller, EPA Region 4. (October 06, 1997) Concerning revision of Lead cleanup levels.
- 11. "Record of Decision," EPA Region 4. (April 29, 1998)

6.0 REMEDIAL DESIGN (RD)

6.8 Remedial Design Documents

- Cross Reference: Memo from John Matthews, EPA-Robert S. Kerr Environmental Research Laboratory, to Craig Zeller, EPA Region 4. (November 30, 1994) Concerning technical review comments of the Conceptual Design for Interim Remedial Measures. [Filed and cited in Entry Number 1 of 18. 8 INITIAL REMEDIAL MEASURE (IRM) RECORDS - Initial Remedial Measure (IRM) Reports]
- Cross-Reference: Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc.
 Concerning EPA comments on the draft Technical Memorandum Phase III Ecological Sampling;
 included are a letter and a memo from South Carolina Department of Health and Environmental
 Control commenting on the draft Technical Memorandum Phase III Ecological Sampling and the
 draft Interim Action Remedial Design for Drainage and Groundwater Collection Facilities. (October
 17, 1995) [Filed and cited in Entry Number 4 of 4.8 FEASIBILITY STUDY (FS) Interim
 Deliverables.
- 3. Cross Reference: Letter from John Cuddihee and Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (December 06, 1995) Transmitting responses to EPA/SCDHEC comments on IRM Design documents. [Filed and cited in Entry Number 6 of 18. 8 INITIAL REMEDIAL MEASURE (IRM) RECORDS Initial Remedial Measure (IRM) Reports]
- Cross Reference: "Interim Action Remedial Design for Drainage and Groundwater Collection Facilities, Former Koppers Site, Volume I," ENSR Consulting and Engineering. (February 1996) [Filed and cited in Entry Number 7 of 18. 8 INITIAL REMEDIAL MEASURE (IRM) RECORDS -Initial Remedial Measure (IRM) Reports]
- Cross Reference: "Interim Action Remedial Design for Groundwater Treatment System, Former Koppers site, Volume I," ENSR Consulting and Engineering. (February 1996) [Filed and cited in Entry Number 8 of 18.8 INITIAL REMEDIAL MEASURE (IRM) RECORDS - Initial Remedial Measure (IRM) Reports]

7.0 REMEDIAL ACTION (RA)

7. 8 Remedial Action Documents

- 1. Cross-Reference: "Technical Specifications for the Interim Remedial Action Groundwater Collection Facilities, Former Koppers Site, Volume II," ENSR Consulting and Engineering. (April 04, 1996)
- 2. Cross-Reference: "Technical Specifications for the Interim Remedial Action Groundwater Treatment Plan, Former Koppers Site, Volume II," ENSR Consulting and Engineering. (April 04, 1996)

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

10.0 ENFORCEMENT

10.1 Correspondence

Letter from Billie Flaherty, Beazer East, Inc., to Kevin Beswick, EPA Region 4. (October 23, 1996)
 Transmitting supplemental materials documenting the involvement of the potentially responsible parties (PRPs) who have been discussing the possibility of settlement with respect to liability at the site; the materials include portions of depositions, Administrative Orders, references, trial documents, and evidentiary documents for certain PRPs.

10. 6 State and Local Enforcement Records

- Letter from Richard Chinnis, South Carolina Coastal Council, to Shannon Craig, Beazer East, Inc. (February 22, 1993) Transmitting a permit allowing soil borings in tidal wetlands within the coastal zone of South Carolina.
- Letter from William Britton, South Carolina Department of Health and Environmental Control, to Douglas Simmons, ENSR Consulting and Engineering. (May 20, 1993) Transmitting a Monitoring Well Approval for the groundwater monitoring wells, minipiezometers, and drive-point mini-wells to be installed at the site.
- Letter from William Britton, South Carolina Department of Health and Environmental Control, to Douglas Simmons, ENSR Consulting and Engineering. (January 27, 1994) Transmitting a Monitoring Well Installation Approval for the groundwater monitoring wells and the drive-point mini-well to be installed during Phase II of the Remedial Investigation.
- Letter from William Britton, South Carolina Department of Health and Environmental Control, to Douglas Simmons, ENSR Consulting and Engineering. (March 16, 1995) Transmitting a Monitoring Well Installation Approval for the drive-point wells to be installed during Phase III of the RI
- Letter from William Britton, South Carolina Department of Health and Environmental Control, to Douglas Simmons, ENSR Consulting and Engineering. (May 20, 1996) Transmitting a Monitoring Well Installation Approval for the deep monitoring wells and the extraction wells to be installed during the Interim Remedial Measure.
- Letter from William Britton, South Carolina Department of Health and Environmental Control, to J. Laurence Daw, TRC Environmental Corporation. (September 26, 1996) Transmitting a Monitoring Well Installation Approval for the groundwater extraction wells to be installed during the Interim Remedial Measure.

10. 9 General Negotiations

Letter from Billie Flaherty, Beazer East, Inc., to Kevin Beswick, EPA Region 4. (October 11, 1996)
Concerning Beazer's contention that the PRPs who wish to settle are liable for more than the
settlement offered.

10.11 EPA Administrative Orders

- Letter from William Giarla, Beazer East, Inc., to Wayne Lee, EPA Region 4. (January 11, 1993)
 Transmitting the reviewed Administrative Order on Consent and discussing a change that Beazer East, Inc. made to it.
- 2. Letter from Joseph Franzmathes, EPA Region IV, to Shannon Craig, Beazer East, Inc., Transmitting the Unilateral Administrative Order for Interim Remedial Design/Remedial Action at the Koppers (Charleston Property) Superfund Site. (May 22, 1995)

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

10.0 ENFORCEMENT

10.11 EPA Administrative Orders

3. Unilateral Administrative Order IN THE MATTER OF KOPPERS CO., INC (CHARLESTON PLANT), Beazer East, Inc., Respondents, Docket No. 95-18-C. (May 22, 1995)

10.13 Interviews, Depositions, and Affidavits

 Cross Reference: Letter from Billie Flaherty, Beazer East, Inc., to Kevin Beswick, EPA Region 4. (October 23, 1996) Transmitting supplemental materials documenting the involvement of the potentially responsible parties (PRPs) who have been discussing the possibility of settlement with respect to liability at the site; the materials include portions of depositions, Administrative Orders, references, trial documents, and evidentiary documents for certain PRPs. [Filed and cited in Entry Number 1 of 10. 1 ENFORCEMENT - Correspondence]

10.15 Trial Documents

 Cross-Reference: Letter from Billie Flaherty, Beazer East, Inc., to Kevin Beswick, EPA Region 4.
 Transmitting supplemental materials documenting the involvement of the potentially responsible parties (PRPs) who have been discussing the possibility of settlement with respect to liability at the site; the materials include portions of depositions, Administrative Orders, references, trial documents, and evidentiary documents for certain PRPs. (October 23, 1996) [Filed and cited in Entry Number 1 of 10.1 ENFORCEMENT - Correspondence].

11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)

11. 1 General and Contractor-Related Correspondence

- 1. Letter from Billie Flaherty, Beazer East, Inc., to Wayne Lee, EPA Region 4. (December 06, 1993)
 Transmitting information regarding the fertilizer companies associated with and located adjacent to the former Koppers Company, Inc. Wood Treating site.
- 2. Memo from Craig Zeller, EPA Region 4, to Robert Denham, Powell, Goldstein, Frazer, & Murphy. (April 26, 1994) Concerning transmittal of additional 104(e) letters.

11.8 Contractor Deliverables

 Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (September 02, 1993)
 Transmitting the Final Phase I RI/FS Oversight Report, Prepared by B&V Waste Science and Technology Corp.

11.11 PRP-Specific Evidence

 Cross-Reference: Letter from Billie Flaherty, Beazer East, Inc., to Kevin Beswick, EPA Region 4.
 Transmitting supplemental materials documenting the involvement of the potentially responsible parties (PRPs) who have been discussing the possibility of settlement with respect to liability at the site; the materials include portions of depositions, Administrative Orders, references, trial documents, and evidentiary documents for certain PRPs. (October 23, 1996) [Filed and cited in Entry Number 1 of 10.1 ENFORCEMENT - Correspondence].

11.14 Title Searches

1. Letter from Billie Flaherty, Beazer East, Inc., to Wayne Lee, EPA Region 4. (January 25, 1994) Concerning the present status of Columbia Nitrogen Corporation.

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

13.0 COMMUNITY RELATIONS

13. 1 Correspondence

- 1. Note from Jeff Forslund, Fenn-Vac, Inc., to EPA Region 4. (DATE UNKNOWN) In response to the Proposed Plan, Mr. Forslund offers Fenn-Vac's assistance once a final approach is defined.
- 2. Letter from Kevin White, Du Pont, to Craig Zeller, EPA Region 4. (April 28, 1997) Requesting a 60-day extension of the public comment period.
- Letter from Kevin White, Du Pont, to Craig Zeller, EPA Region 4. (May 13, 1997) Requesting an
 extension of the public comment period and stating their belief that relevant data is missing from
 the Administrative Record.
- 4. Letter from Kevin White, Du Pont, to Craig Zeller, EPA Region 4. (May 29, 1997) Requesting an extension of the public comment period and again stating their belief that relevant data is missing from the Administrative Record.
- Letter from Craig Zeller, EPA Region 4, to Kevin White, Du Pont. (June 02, 1997) Responding to Du Pont's requests for public comment period extensions and their belief that relevant data is missing from the Administrative Record.
- 6. Letter from P. Trapier G. Puckette, General Engineering Laboratories, Inc., to Craig Zeller, EPA Region 4. (July 01, 1997) Transmitting results of dioxin analyses conducted on sediment samples from various sites in the Charleston Harbor Estuary.
- Letter from Paul Anderson, Ogden, to Craig Zeller, EPA Region 4. (September 22, 1997)
 Transmitting a paper entitled "Evaluation of Dioxin/furan Levels in Charleston Harbor Area Sediments".
- 8. Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (October 15, 1997) Responding to Du Pont's claim that relevant data is missing from the Administrative Record.

13. 6 Community Relations Plans

 "Community Relations Plan for Koppers Company, Inc. (Charleston Plant) Superfund Site Charleston, South Carolina," U.S. EPA. (June 1993)

13. 7 News Clippings and Press Releases

- 1. "Ashley River Site Studied for Superfund Clean-Up" News and Courier Charleston, SC. (January 26, 1988)
- 2. "The United States Environmental Protection Agency is accepting public comments on the Proposed Cleanup Plan for the Koppers Co., Inc. (Charleston Plant) Superfund Site Charleston, Charleston County, South Carolina" The Post and Courier Charleston, SC. (April 06, 1997)
- "The United States Environmental Protection Agency announces an extension of the public comment period for the Proposed Cleanup Plan for the Koppers Co., Inc., (Charleston Plant) Superfund Site - Charleston, Charleston County, South Carolina" The Post and Courier -Charleston, SC. (May 02, 1997)

13.8 Public Meetings

 Letter from Craig Zeller, EPA Region 4, to Douglas Simmons, ENSR Consulting and Engineering. (January 20, 1995) Transmitting a chronological list of slides that EPA wants ENSR to prepare for the 1/26/95 public meeting.

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

13.0 COMMUNITY RELATIONS

13.8 Public Meetings

2. Cross-Reference: the TRANSCRIPT, PROPOSED PLAN PUBLIC MEETING FOR THE KOPPERS CO., INC. SITE can be found in the RECORD OF DECISION, Appendix B, Attachment 1, pages 5 9 0347 through 5 9 0452. (April 15, 1997) [Filed and Cited as Entry Number 11 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].

13. 9 Fact Sheets

- "United States Environmental Protection Agency Superfund Fact Sheet, Koppers Company, Inc. (Charleston Plant) Superfund Site, Charleston County, South Carolina," EPA Region IV. (May 1993)
- "Environmental Fact Sheet EPA Simplifies Land Disposal Restrictions by Establishing a Set of Universal Treatment Standards, and Finalizes Treatment Standards for 42 Newly Listed and Identified Wastes," Office of Solid Waste and Emergency Response - United States Environmental Protection Agency. (August 1994)
- 3. Cross Reference: Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (February 20, 1995) Concerning comments on the Human Health Baseline Risk Assessment and the Interim Remedial Action fact sheet; included is a revised portion of the Uncertainty and Limitations Section of the Human Health BRA. [Filed and cited in Entry Number 16 of 3.12 REMEDIAL INVESTIGATION (RI) Endangerment Assessments]
- Cross Reference: Superfund Proposed Plan Fact Sheet Koppers Co., Inc. (Charleston Plant) NPL Site - Charleston, Charleston County, South Carolina. (March 1997) [Filed and cited in Entry Number 4 of 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

16.0 NATURAL RESOURCE TRUSTEE

16. 1 Correspondence

- Cross Reference: Letter from Jane Settle, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region 4. (September 01, 1994) Concerning review of Section 6 of the [draft] Remedial Investigation Report. [Filed and cited in Entry Number 5 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
- Cross Reference: Memo from Waynon Johnson, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (September 07, 1994) Concerning comments on the draft Remedial Investigation Report. [Filed and cited in Entry Number 7 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
- Cross Reference: Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (December 12, 1994) Transmitting EPA and SCDHEC/Natural Resource Trustee comments (which are attached) on the revised Remedial Investigation report. [Filed and cited in Entry Number 11 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
- Cross Reference: Letter from John Lindsay, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (October 06, 1995) Concerning comments on the draft Technical Memorandum Phase III Ecological Sampling. [Filed and cited in Entry Number 2 of 4.8 FEASIBILITY STUDY (FS) - Interim Deliverables]
- 5. Cross Reference: Letter from Jane Settle, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region 4. (October 10, 1995) Concerning comments on the draft Technical Memorandum Phase III Ecological Sampling. [Filed and cited in Entry Number 3 of 4.8 FEASIBILITY STUDY (FS) Interim Deliverables]

Administrative Record Index for the KOPPERS CO., INC. (CHARLESTON PLANT) NPL Site

16.0 NATURAL RESOURCE TRUSTEE

16. 1 Correspondence

- 6. Cross Reference: Letter from John Lindsay, National Oceanic and Atmospheric Administration, to Shannon Craig, Beazer East, Inc. (November 01, 1995) Concerning possible applications of Habitat Equivalency Analysis (HEA) within the FS time frame. [Filed and cited in Entry Number 2 of 4. 9 FEASIBILITY STUDY (FS) Feasibility Study (FS) Reports]
- Cross Reference: Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Shannon Craig, Beazer East, Inc. (March 18, 1996) Concerning a technical agreement in principle that Beazer will create the equivalent of five acres of wetlands within or near the Koppers Site. [Filed and cited in Entry Number 4 of 4. 9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 8. Cross Reference: Routing and Transmittal slip from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (March 21, 1996) Transmitting comments on the Feasibility Study. [Filed and cited in Entry Number 6 of 4. 9 FEASIBILITY STUDY (FS) Feasibility Study (FS) Reports]
- Cross Reference: Letter from Jane Settle, South Carolina Department of Natural Resources, Craig Zeller, EPA Region 4. (March 25, 1996) Concerning comments on the draft Feasibility Study. [Filed and cited in Entry Number 8 of 4. 9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- Cross Reference: Memo from Craig Zeller, EPA Region 4, to Denise Klimas, National Oceanic and Atmospheric Administration. (April 08, 1996) Concerning a request for specifications on the Low Intertidal SPARTINA Marsh Reconstruction/Creation. [Filed and cited in Entry Number 9 of 4. 9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- 11. Cross Reference: Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (April 15, 1996) Concerning comments on the draft Feasibility Study Report. [Filed and cited in Entry Number 10 of 4.9 FEASIBILITY STUDY (FS) Feasibility Study (FS) Reports]
- 12. Cross Reference: Letter from Shannon Craig, Beazer East, Inc., to Denise Klimas, National Oceanic and Atmospheric Administration. (April 29, 1996) Concerning response to NOAA's 3/18/96 letter regarding the Technical Agreement in Principle for Beazer to create wetlands in or near the Koppers site. [Filed and cited in Entry Number 11 of 4. 9 FEASIBILITY STUDY (FS) Feasibility Study (FS) Reports]
- 13. Cross Reference: Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (May 01, 1996) Concerning recommendations and guidelines regarding a marsh creation plan, that Craig Zeller requested in his 4/8/96 letter. [Filed and cited in Entry Number 12 of 4. 9 FEASIBILITY STUDY (FS) Feasibility Study (FS) Reports]
- 14. Cross Reference: Letter from Roger Banks, US Department of the Interior, to Craig Zeller, EPA Region 4. (May 06, 1996) Concerning comments on the following two documents: Technical Memorandum Phase III Ecological Sampling; and Summary of Ecological Studies and Assessment of Potential Risk. [Filed and cited in Entry Number 10 of 4.8 FEASIBILITY STUDY (FS) Interim Deliverables]
- 15. Cross Reference: Letter from Roger Banks, US Department of the Interior, to Craig Zeller, EPA Region IV, Concerning Comments on Draft Ecological Risk Assessment, Prepared by ERT for the EPA. (August 02, 1996) [Filed and cited in Entry Number 29 of 3.12 REMEDIAL INVESTIGATION (RI) Endangerment Assessments]

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16.0 NATURAL RESOURCE TRUSTEE

16. 1 Correspondence

- 16. Cross Reference: Letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region IV, Concerning Comments on Draft Ecological Risk Assessment, Prepared by ERT for the EPA. (August 12, 1996) [Filed and cited in Entry Number 32 of 3.12 REMEDIAL INVESTIGATION (RI) Endangerment Assessments]
- 17. Cross Reference: Letter from Robert Duncan, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region IV, Concerning Comments on the Site-Specific Baseline Ecological Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 10, 1996) [Filed and cited in Entry Number 36 of 3.12 REMEDIAL INVESTIGATION (RI) Endangerment Assessments]
- 18. Cross Reference: Letter from Catherine Duncan, US Department of the Interior, to Craig Zeller, EPA Region IV, Concerning Comments on the Site-Specific Baseline Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 15, 1996) [Filed and cited in Entry Number 37 of 3.12 REMEDIAL INVESTIGATION (RI) Endangerment Assessments]
- Cross Reference: A letter from Denise Klimas, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region IV, Concerning Comments on the Site-Specific Baseline Risk Assessment, Prepared by Ogden for Beazer East, Inc. (October 23, 1996) [Filed and cited in Entry Number 38 of 3.12 REMEDIAL INVESTIGATION (RI) - Endangerment Assessments]
- 20. Cross Reference: Letter from Robert Duncan, South Carolina Department of Natural Resources, to Craig Zeller, EPA Region 4. (September 10, 1997) Concerning comments on the Record of Decision (ROD). [Filed and cited in Entry Number 6 of 5.9 RECORD OF DECISION (ROD) Record of Decision (ROD)]
- 21. Cross Reference: Letter from Tom Dillon, National Oceanic and Atmospheric Administration, to Craig Zeller, EPA Region 4. (September 15, 1997) Concerning comments on the Record of Decision (ROD). [Filed and cited in Entry Number 8 of 5. 9 RECORD OF DECISION (ROD) Record of Decision (ROD)]
- 22. Cross Reference: Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (October 15, 1997) Concerning Beazer's response to Natural Resource Trustee comment to the Proposed Remedial Action Plan. [Filed and cited in Entry Number 14 of 4.10 FEASIBILITY STUDY (FS) Proposed Plans for Selected Remedial Action]

17.0 SITE MANAGEMENT RECORDS

17. 1 Correspondence

- Letter from Craig Zeller, EPA Region 4, to Douglas Simmons, ENSR Consulting and Engineering. (October 07, 1993) Transmitting ERM-Southwest's Site Related Investigation Results for Koppers - Charleston.
- 2. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (September 12, 1995) Concerning an Action Item List for completion of the RI/FS process.
- 3. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (June 17, 1996) Concerning Beazer's plan to install a fence at the Hagood Avenue ditch.

17. 2 Access Records

Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (February 26, 1993)
Concerning Beazer East's efforts to obtain site access for Beazer, its consultants and agents, and
EPA for implementation of RI/FS work.

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17.0 SITE MANAGEMENT RECORDS

17. 2 Access Records

Letter from Elizabeth Henry Warner, Buist, Moore, Smythe & McGee, to Craig Zeller, EPA Region
 (April 23, 1993) Concerning status of site access actions.

17. 4 Site Audio-Visuals

 Letter from Craig Zeller, EPA Region 4, to Douglas Simmons, ENSR Consulting and Engineering. (February 14, 1994) Concerning transmittal of historical aerial photography analysis conducted by EPIC.

17. 5 Site Descriptions and Chronologies

- Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (September 02, 1993) Concerning interim project schedule through initiation of the Phase II Field Program.
- 2. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (August 12, 1994) Concerning the schedule for the completion of the RI/FS.

17. 7 Reference Documents

- "Ground-Water Resources of South Carolina's Coastal Plain--1988 An Overview," State of South Carolina, Water Resources Commission (Report Number 167, 1989). (DATE UNKNOWN) [NOTE: THIS DOCUMENT IS FILED AFTER THE REPORT ENTITLED "SW-846 Test Methods for Evaluating Solid Waste, Volume II [Chapter 9]," IN THE ADMINISTRATIVE RECORD].
- "Bottom Fishes of South Carolina Estuaries Relative Abundance, Seasonal Distribution, and Length-Frequency Relationships, Technical Report Number 6," South Carolina Wildlife and Marine Resources Department. (October 1974)
- 3. "SW-846-Test Methods for Evaluating Solid Waste, Volume II [Chapter 9]," United States Environmental Protection Agency. (September 1986)
- 4. "Area X Sanitary Survey 1980 1986," South Carolina Department of Health and Environmental Control. (October 1987)
- Memo from Richard Guimond, United States Protection Agency, to Addressees. (October 04, 1993)
 Transmitting OSWER Directive 9234.2-25: "Guidance for Evaluating the Technical Impracticability of Groundwater Restoration".
- 6. Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (December 03, 1993) Transmitting Grace-Dearborn bioremediation information.
- 7. Letter from William Britton, South Carolina Department of Health and Environmental Control, to Douglas Simmons, ENSR Consulting and Engineering. (June 28, 1994) Transmitting "North Carolina Wellhead Protection Program Applications Manual," by Ralph Heath for the Groundwater Section, North Carolina Department of Environment, Health, and Natural Resources; used to estimate the recharge rate to the water-table aquifer at Koppers.
- 8. Memo from Stephen Luftig, United States Environmental Protection Agency, to Addressees.
 (January 19, 1995) Concerning consistent implementation of the FY 1993 Guidance on Technical Impracticability of Groundwater Restoration at Superfund Sites.
- Memo from Devereaux Barnes, United States Environmental Protection Agency, to Norm Niedergang, United States Environmental Protection Agency. (February 17, 1995) Concerning P and U listed wastes and the Contained-In Policy.

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17.0 SITE MANAGEMENT RECORDS

17. 7 Reference Documents

- "Assessment of Technologies for Manistique River and Harbor Area of Concern Report of U.S. Army Corps of Engineers to the Interagency Review Team," U.S. Corps of Engineers. (March 30, 1995)
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (May 05, 1995) Transmitting the ASTM E 1611-94 Standard Guide for Conducting Sediment Toxicity Tests with Marine and Estuarine Polychaetous Annelids.
- 12. Memo from Elliott Laws, United States Environmental Protection Agency, to Addressees. (November 28, 1995) Concerning formation of the National Superfund Remedy Review Board.
- 13. Letter from Billie Flaherty, Beazer East, Inc., to Craig Zeller, EPA Region 4. (January 12, 1996)
 Transmitting a consultant-prepared document entitled: "Potential Environmental Contamination
 Attributable to Superphosphate Fertilizer Production".
- 14. Memo from Michael Shapiro, Stephen Luftig, and Jerry Clifford, United States Environmental Protection Agency, to RCRA Branch Chiefs and CERCLA Regional Managers. (March 13, 1996) Concerning use of the Area of Contamination (AOC) concept during RCRA cleanups.
- 15. Cross-Reference: Letter from Billie Flaherty, Beazer East, Inc., to Kevin Beswick, EPA Region 4. Transmitting supplemental materials documenting the involvement of the potentially responsible parties (PRPs) who have been discussing the possibility of settlement with respect to liability at the site; the materials include portions of depositions, Administrative Orders, references, trial documents, and evidentiary documents for certain PRPs. (October 23, 1996) [Filed and cited in Entry Number 1 of 10.1 ENFORCEMENT Correspondence].

17. 8 State and Local Technical Records

- Joint Public Notice, Charleston District, Corps of Engineers and the South Carolina Coastal Council
 and the South Carolina Department of Health and Environmental Control. (February 28, 1983)
- "Hazardous Waste Characterization Analysis," General Engineering Laboratories. (August 09, 1984)
- Internal Memo from Wayne Fanning, South Carolina Department of Health and Environmental Control, to Ron Kinney, South Carolina Department of Health and Environmental Control. (December 14, 1984) Concerning Emergency Containment Work at Southern Dredging.
- 4. Memo from Wayne Fanning, South Carolina Department of Health and Environmental Control, to Robert Rose, NUS Corporation. (April 29, 1988) Concerning Other Possible Contaminating Sites.

18.0 INITIAL REMEDIAL MEASURE (IRM) RECORDS

18. 1 Correspondence

- Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (September 29, 1993)
 Concerning expediting the RI/FS process at the Site by considering an Interim Action Record of
 Decision focusing on the barge canal portion of the Site.
- Letter from Shannon Craig, Beazer East, Inc., to Craig Zeller, EPA Region 4. (April 29, 1994)
 Recommending the consideration of Interim Remedial Measures in the area of the drainage ditch located along Milford Street.

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18.0 INITIAL REMEDIAL MEASURE (IRM) RECORDS

18. 1 Correspondence

- Letter from Anthony Maglione, City of Charleston Public Works, to Douglas Simmons, ENSR
 Consulting and Engineering. (October 30, 1996) Requesting information as to what the concrete
 structures are and where the capped pipelines terminate that were discovered during cleaning
 operations performed in preparation for the cleaning of the sump area.
- Letter from Douglas Simmons, ENSR Consulting and Engineering, to Anthony Maglione, City of Charleston Public Works. (January 03, 1997) Responding to the 10/30/96 letter for information regarding structures in the sump area.

18. 4 Work Plans and Progress Reports

Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4.
 (April 03, 1997) Response to comments on Non-Aqueous Phase Liquid (NAPL) Recovery Program Report of Findings.

18. 7 Operations and Maintenance Records

 Transmittal from Randy Patrick, Davis & Floyd, to Craig Zeller, EPA Region IV, Concerning Field Order No. 5 to Contractor and Drawings for the Order. (November 07, 1996)

18. 8 Initial Remedial Measure (IRM) Reports

- Memo from John Matthews, EPA-Robert S. Kerr Environmental Research Laboratory, to Craig Zeller, EPA Region 4. (November 30, 1994) Concerning technical review comments of the Conceptual Design for Interim Remedial Measures.
- 2. "Technical Memorandum: Interim Remedial Measure, Former Koppers Site, Charleston, South Carolina," ENSR Consulting and Engineering. (January 1995)
- 3. Cross Reference: Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (March 06, 1995) Concerning EPA's approval of the RI Report and the Technical Memorandum for Interim Remedial Measures; attached are comments from the South Carolina Department of Health and Environmental Control on the RI, as well as draft procedures for reclassification of state waters. [Filed and cited in Entry Number 17 of 3.10 REMEDIAL INVESTIGATION (RI) Remedial Investigation (RI) Reports]
- Cross Reference: "Interim Action Record of Decision (ROD) for the Koppers Co., Inc. (Charleston Plant) NPL Site, Charleston, Charleston County, South Carolina, March 1995," EPA Region IV. (March 29, 1995) [Filed and cited in Entry Number 1 of 5. 9 RECORD OF DECISION (ROD) Record of Decision (ROD)]
- 5. Cross Reference: Letter from Craig Zeller, EPA Region 4, to Shannon Craig, Beazer East, Inc. (October 17, 1995) Concerning EPA comments on the draft Technical Memorandum Phase III Ecological Sampling; included are a letter and a memo from South Carolina Department of Health and Environmental Control commenting on the draft Technical Memorandum Phase III Ecological Sampling and the draft Interim Action Remedial Design for Drainage and Groundwater Collection Facilities. [Filed and cited in Entry Number 4 of 4.8 FEASIBILITY STUDY (FS) Interim Deliverables]
- 6. Letter from John Cuddihee and Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (December 06, 1995) Transmitting responses to EPA/SCDHEC comments on IRM Design documents.

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18.0 INITIAL REMEDIAL MEASURE (IRM) RECORDS

18. 8 Initial Remedial Measure (IRM) Reports

- 7. "Interim Action Remedial Design for Drainage and Groundwater Collection Facilities, Former Koppers Site, Volume I," ENSR Consulting and Engineering. (February 1996)
- 8. "Interim Action Remedial Design for Groundwater Treatment System, Former Koppers site, Volume 1," ENSR Consulting and Engineering. (February 1996)
- 9. "Technical Specifications for the Interim Remedial Action Groundwater Collection Facilities, Former Koppers Site, Volume II," ENSR Consulting and Engineering. (April 04, 1996)
- "Technical Specifications for the Interim Remedial Action Groundwater Treatment Plan, Former Koppers Site, Volume II," ENSR Consulting and Engineering. (April 04, 1996)
- Letter from James Carter, TRC Environmental Solutions, Inc., to Craig Zeller, EPA Region IV, Transmitting NAPL Recovery Program Report Findings - Interim Remedial Action. (October 18, 1996)
- 12. NAPL Recovery Program Report on Findings Interim Remedial Action Former Koppers Site Charleston, South Carolina, TRC Environmental Solutions, Inc. (October 18, 1996)
- 13. Letter from Douglas Simmons, ENSR Consulting and Engineering, to Craig Zeller, EPA Region 4. (March 28, 1997) Concerning a summarization of sump abandonment activities.
- 14. "Final Document Report Interim Remedial Action Volume 1 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- 15. "Final Document Report Interim Remedial Action Volume 2 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- "Final Document Report Interim Remedial Action Volume 3 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- 17. "Final Document Report Interim Remedial Action Volume 4 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- "Final Document Report Interim Remedial Action Volume 5 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- "Final Document Report Interim Remedial Action Volume 6 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- "Final Document Report Interim Remedial Action Volume 7 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- 21. "Final Document Report Interim Remedial Action Volume 8 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- 22. "Final Document Report Interim Remedial Action Volume 9 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- 23. "Final Document Report Interim Remedial Action Volume 10 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)
- 24. "Final Document Report Interim Remedial Action Volume 11 of 11," prepared by Dames & Moore for Beazer East, Inc. (December 30, 1997)